

UNITED STATES DISTRICT COURT
FOR DISTRICT OF OREGON
PORTLAND DIVISION

JENNIFER RAE GUNTER, individually and
as a natural parent of A.G.; ROBERT JAY
SCHWARTZ, individually and as a natural parent
of J.S.; HOLLY LYNN GOVE, individually
and as a natural parent of M.G.; CHELSEA
ELIZABETH PERRITT, individually and as a
natural parent of L.P.

Plaintiff(s),

v.

Case No.: 3:21-cv-01661-YY

NORTH WASCO COUNTY SCHOOL
DISTRICT BOARD OF EDUCATION;
CAROLYN BERNAL, in her individual
capacity and in her official capacity as
Superintendent of the North Wasco County
Public School District; and REBECCA
THISTLETHWAITE, DAWN RASMUSSEN,
DAVID JONES, JOHN NELSON, BRIAN
STEVENS, JOSE APARICIO, JUDY
RICHARDSON, all in their individual capacities
and in their capacities as members of the North
Wasco County School District Board of
Education,

Defendant(s).

MOTION FOR EXTENSION OF TIME TO
AMEND VERIFIED COMPLAINT FOR DECLARATORY JUDGEMENT

Plaintiffs move this court for an extension of time of 24 days from January 21, 2022, to and including February 14, 2022, to serve and file the Amended Verified Complaint for Declaratory Judgement. The (Amended Verified Complaint for Declaratory Judgement is due on January 21,

MOET TO AMEND COMPLAINT

2022; this is the 1st extension for a total of 54 days. The reason for the request is extended time to seek and retain possible counsel for plaintiffs and or minors, as 30-day time frame order was submitted 3 days prior to the Christmas Holiday, most law offices were closed or on vacation through the New Year seeking representation has been challenging, as well as firms are overflowing with current Oregon caseloads. Furthermore, extension of time to amend complaint and adjust parties. Counsel was notified on 1/20/22, and again on 1/24 of motion of extension, defense responded 1/20/22 and on 1/24/22. Defense counsel stated disapproval of motion for extension. I certify that, upon the confirmation email stating that the document has been accepted by the eFiling system, this Motion will be eServed pursuant to ORAP 16.45 on Mr. Brett Mersereau.

Respectfully submitted this _____ January 25, 2022_____.

/s/ Jennifer Rae Gunter 1601
G St.
The Dalles, OR 97058
(Telephone) 541-993-5366

/s/ Robert Jay Schwartz ND LAC
3135 Mill Creek Road The
Dalles, OR 97058
(Telephone) 541-296-8988

/s/ Holly Lynn Gove
421 W. 15th St
The Dalles, OR 97058
(Telephone) 541-993-4707

/s/ Chelsea Elizabeth Perritt
219 W. 14th Street
The Dalles, OR 97058
(Telephone) 503-437-8370

MOET TO AMEND COMPLAINT

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